

Andrew S. Moses, OSB No. 983009
amoses@gordon-polscer.com
GORDON & POLSCER, L.L.C.
9755 S.W. Barnes Road, Suite 650
Portland, OR 97225
Telephone: (503) 242-2922
Facsimile: (503) 242-1264

Attorneys for Defendant The Prudential Insurance Company of America

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KEN W. CARLSON,

Case No. 3:19-cv-00861-BR

Plaintiff,

v.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA,

Defendant,

**UNOPPOSED MOTION FOR AN ORDER
EXTENDING DEADLINE FOR
DEFENDANT THE PRUDENTIAL
INSURANCE COMPANY OF AMERICA
TO ANSWER OR PRESENT OTHER
DEFENSES OR OBJECTIONS TO
PLAINTIFF'S COMPLAINT**

I. LR 7-1 CERTIFICATION

Pursuant to LR 7-1, the undersigned counsel for Defendant The Prudential Insurance Company of America ("Defendant") certifies that co-counsel for Defendant has conferred in good faith with counsel for Plaintiff Ken W. Carlson ("Plaintiff"), and hereby certifies that Plaintiff does not oppose the relief moved for herein.

**UNOPPOSED MOTION FOR AN ORDER EXTENDING DEADLINE FOR
DEFENDANT THE PRUDENTIAL INSURANCE COMPANY OF
AMERICA TO ANSWER OR PRESENT OTHER DEFENSES OR
OBJECTIONS TO PLAINTIFF'S COMPLAINT**

Page 1

II. MOTION

Defendant moves the Court for an Order granting Defendant fourteen (14) additional days, until and including July 11, 2019, to complete its investigation and prepare its response to Plaintiff's complaint. Plaintiff does not oppose the relief moved for. The requested extension is sought in good faith and upon the good cause shown in the following Memorandum.

III. MEMORANDUM OF POINTS AND AUTHORITIES

Defendant respectfully requests a fourteen (14) day extension of the current deadline to file an answer or present other defenses or objections to Plaintiff's complaint until and including July 11, 2019. By this motion, Defendant does not waive any objections, defenses, or claims it may have in this action.

Pursuant to LR 16-3, Defendant states the following:

1. There is good cause to extend the deadline for Defendant to answer or present other defenses or objections to Plaintiff's complaint to afford Defendant adequate time to complete its investigation and prepare its response to Plaintiff's complaint.
2. On June 4, 2019, Plaintiff commenced a civil action against Defendant by filing a complaint in this Court.
3. On June 6, 2019, Defendant was served with the Complaint.
4. The current deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint is June 27, 2019.
5. Defendant is promptly collecting and reviewing the relevant file documents in order to prepare a response to Plaintiff's Complaint, but requests fourteen (14) additional days, until and including July 11, 2019, to complete its investigation and prepare its response.

6. On June 19, 2019, Counsel for Defendant conferred with Counsel for Plaintiff, who indicated that Plaintiff does not object to or oppose Defendant's Motion.
7. There are no status conferences or hearings that will be affected by this motion.
8. This is Defendant's first request for an extension.
9. This request is made in good faith and not for the purposes of causing unwarranted delay.

WHEREFORE, Defendant respectfully requests that the Court enter an order granting it until July 11, 2019, to file its Answer or otherwise respond to Plaintiff's Complaint.

DATED this 21st day of June, 2019.

Respectfully Submitted

s/ Andrew S. Moses

Andrew S. Moses, OSB No. 983009

amoses@gordon-polscer.com

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(503) 242-2922

Attorneys for Defendant The Prudential Insurance
Company of America